



Appellate Court of Maryland

Robert C. Murphy Courts of Appeal Building

361 Rowe Boulevard

Annapolis, Maryland 21401-1699

CITATION TO UNREPORTED OPINIONS ON AND AFTER JULY 1, 2023

The citation to unreported opinions in Maryland courts is governed by Maryland Rule 1-104. Following revision to Rule 1-104, effective July 1, 2023, parties will be permitted in certain circumstances to cite unreported opinions of the Maryland appellate courts and of certain other jurisdictions. The following summary is provided solely as an overview of the Rule and should not be treated as a substitute for consultation with the Rule. Parties should consult Rule 1-104.

- **No citation for precedential value.** An unreported opinion may not be cited for precedential value within the rule of stare decisis;
- **Where citation for persuasive value is permitted.** An unreported opinion of the Supreme Court of Maryland or the Appellate Court of Maryland issued on or after July 1, 2023 may be cited for its persuasive value, but only if no reported authority adequately addresses the issue before the court;
- **Per curiam opinions may not be cited for precedential or persuasive value;**
- **Where citation of unpublished decisions of other jurisdictions is permitted.** An unreported or unpublished opinion, order, or other decision issued by a federal court or by a court in a jurisdiction other than Maryland may be cited as persuasive authority if the jurisdiction in which the opinion was issued would permit it to be cited as persuasive authority or as precedent. The attached appendix contains a list of jurisdictions that the Court understands currently permit citation of unreported opinions for persuasive value; and
- **Attachment.** If a party cites an opinion, order, or decision that is not available in a publicly accessible electronic database, the party shall attach a copy of the cited document to the pleading, brief, or other paper in which the document is cited.

APPENDIX

Jurisdictions that Permit Citation to Unreported Opinions for Persuasive Value

All federal district and circuit courts

Appellate Courts in the States/Commonwealths of:

Alaska
Arizona
Delaware
Georgia
Hawaii
Iowa
Kansas
Kentucky
Louisiana
Massachusetts
Michigan
Minnesota
Nevada
New Hampshire
New Mexico
North Carolina
North Dakota
Ohio
Pennsylvania
Texas
Utah
Vermont
Virginia
Washington
West Virginia
Wisconsin
Wyoming